

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE MICHAEL B. KAPLAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned proposed counsel, requests that the time period to notice a hearing on the *Debtor’s Omnibus Motion to Compel Identified Plaintiff Firms to Supplement Certain Responses to Debtor’s*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Interrogatories and Requests for Production (the “Motion”)² as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1) and the *Order Establishing Case Management and Administrative Procedures* [Dkt. 554], for the reasons set forth below:

1. A shortened hearing time is requested because: Between April 27, 2023, and May 1, 2023, various Plaintiff Firms filed motions to dismiss this case [Dkts. 335, 346, 352, 358, and 384] (the “Motions to Dismiss”).

2. Consistent with this Court’s direction at the hearing conducted on May 3, 2023, LTL and the Plaintiff Firms are conferring with respect to the exchange of discovery in preparation for an evidentiary hearing on the Motion to Dismiss.

3. The Motion is related to the Debtor’s efforts to conduct its discovery, and the issues therein have been known to the parties. To maintain the expedited discovery and briefing schedule issued by the Court, these issues warrant resolution as soon as possible.

4. State the hearing dates requested: The Debtor respectfully requests that these matters be scheduled for a hearing on Friday, June 2, 2023, at 10:00 a.m.

5. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

Dated: May 30, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.

James N. Lawlor, Esq.

Joseph F. Pacelli, Esq. (admitted *pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

jlawlor@wmd-law.com

jpacelli@wmd-law.com

JONES DAY

Gregory M. Gordon

Brad B. Erens

Dan B. Prieto

Amanda Rush

2727 N. Harwood Street

Dallas, Texas 75201

Telephone: (214) 220-3939

Facsimile: (214) 969-5100

gmgordon@jonesday.com

bberens@jonesday.com

dbprieto@jonesday.com

asrush@jonesday.com

(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR